

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

Lana Dufrene

HON. JOEL SCHNEIDER
MAGISTRATE JUDGE

**FOURTH AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF LANA DUFRENE**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Lana Dufrene, on **July 16, 2021 at 11:00 a.m. EST**, and continuing until completion, in-person at Gainsburgh, Benjamin, David, Meunier & Warshauer, LLC, 2800 Energy Centre, 1100 Poydras Street, New Orleans, LA 70163. The court reporter will report the deposition in person and other counsel will be participating from various locations remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Alexandra Bach Lagos
Greenberg Traurig LLP
333 SE 2nd Avenue
Miami, Florida 33133
(305) 579- 0813
lagosa@gtlaw.com

Date: July 7, 2021

Respectfully submitted,

s/ Alexandra B. Lagos

Alexandra B. Lagos (Fla. Bar No. 30035)

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*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July, 2021, I caused a true and correct copy of the foregoing Fourth Amended of Videotaped Deposition of Plaintiff Lana Dufrene to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on July 7, 2021:

Matthew Palmer Lambert, Esq. (counsel for Plaintiff Lana Dufrene)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Jessica Priselac, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

This 7th day of July, 2021.

s/ Alexandra B. Lagos

Alexandra B. Lagos (Fla. Bar No. 30035)

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